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Proposed Interim Lead Counsel

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

ROBERT B. DE MARS and LORENA BARRIOS, individually and on behalf of all others similarly situated, Plaintiffs, v. GOOGLE, INC., Defendant.	No: 12-cv-01382 PSG **STIPULATION AND [PROPOSED] ORDER CONSOLIDATING CASES, APPOINTING INTERIM LEAD COUNSEL, AND EXTENDING TIME TO ANSWER OR OTHERWISE RESPOND**

Additional caption on following page

NICHOLAS ANDERSON individually and on behalf of all others similarly situated, Plaintiff, v. GOOGLE, INC., Defendant.	No: 12-cv-01565 WHA

WHEREAS, this matter having come before the Court by the application of Plaintiffs in the above-referenced, related matters and Defendant Google, Inc. ("Google"), by and through its counsel, requesting that the above-captioned cases be consolidated; that a consolidated complaint be filed within 60 days of the entry of this Order, that Google respond to the consolidated complaint within 60 days of its filing; and that the Court appoint Interim Lead Counsel pursuant to Fed. R. Civ. P. 23 (g); and good cause having been shown:

IT IS HEREBY ORDERED THAT:

1. The actions styled:

(a) *De Mars et al. v. Google, Inc.*, 12-cv-01382 (N.D. Cal.) (filed March 20, 2012); and

(b) *Anderson v. Google, Inc.*, 12-cv-01565 (N.D. Cal.) (filed March 29, 2012) are administratively consolidated for all purposes under the first-filed action, Civil Action No. 12-cv-01382 (the "Consolidated Action").

2. Every pleading and other paper filed in the Consolidated Action shall bear the caption "In re Google, Inc. Privacy Policy Litigation" and shall be filed only in the Consolidated Action (N.D. Cal. Docket No. 12-cv-01382).

3. Upon entry of this Order, Plaintiffs shall either dismiss or move to transfer the related actions currently pending in other jurisdictions and captioned:

(a) *Nisenbaum et al. v. Google, Inc.*, 12-cv-02059 (S.D.N.Y.) (filed March 20, 2012);

(b) *Villani et al. v. Google, Inc.*, 12-cv-01740 (D.N.J.) (filed March 20, 2012); and

(c) *Hoey v. Google, Inc.*, 12-cv-01448 (E.D. Pa.) (filed March 22, 2012).

4. Plaintiffs shall file a consolidated complaint in the Consolidated Action within 60 days of entry of this Order.

5. Defendant need not respond to the complaints filed in the above-referenced actions and shall instead respond to the consolidated complaint within 60 days after it is filed.

6. The case management conference currently scheduled for June 19, 2012 is adjourned, to be rescheduled by the Court.

7. Upon entry of this Order, all other actions that arise out of the same facts and claims as these related actions shall automatically be consolidated with the Consolidated Action.

8. Defendant is not required to respond to any complaints in any action consolidated hereunder other than the consolidated complaint filed in the Consolidated Action.

9. The Court hereby appoints Gardy & Notis, LLP, Grant & Eisenhofer P.A., and Bursor & Fisher, P.A. as Co-Lead Interim Class Counsel for the Consolidated Action ("Lead Counsel"). Lead Counsel shall have sole authority and responsibility for prosecuting the Consolidated Action and shall coordinate and direct on behalf of all Plaintiffs in all related actions: (i) all pre-trial discovery proceedings; (ii) briefing and argument of motions; (iii) calling and chairing meetings of Lead Counsel as appropriate or deemed necessary from time to time; (iv) conducting expert discovery; (v) conducting all trial preparation, trials, and post-trial proceedings; (vi) initiating and conducting any and all settlement negotiations with Defendant's counsel; and (vii) performing such other duties as may be required by the case or expressly authorized by further Order of this Court.

10. Defendant's counsel may rely upon all agreements made with Lead Counsel, or other duly authorized representatives of Lead Counsel, and such agreements shall be binding on Plaintiffs.

11. Service of pleadings and other papers by Defendant shall be made upon Lead Counsel.

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Dated: April 6, 2012

BURSOR & FISHER, P.A.

By: /s/ L. Timothy Fisher

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Attorneys for Defendant, Google, Inc.

SO ORDERED this _______ day of ________________________, 2012

HON. PAUL SINGH GREWAL